IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

AMERICAN SOCIETY FOR TESTING AND MATERIALS d/b/a ASTM INTERNATIONAL;

NATIONAL FIRE PROTECTION ASSOCIATION, INC.; and

AMERICAN SOCIETY OF HEATING, REFRIGERATING, AND AIR CONDITIONING ENGINEERS.

Plaintiffs/Counterdefendants,

v.

PUBLIC.RESOURCE.ORG, INC.,

Defendant/Counterclaimant.

Case No. 1:13-cv-01215-TSC-DAR

CONSENT MOTION FOR EXTENSION OF TIME FOR DEFENDANT'S OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL (DKT. NO. 27)

Defendant-Counterclaimant Public.Resource.Org , Inc. ("Public Resource"), respectfully moves this Court pursuant to Fed. R. Civ. P. 6(b) and LCvR 7 for an extension of time until January 5, 2015 to oppose Plaintiffs' Motion to Compel Discovery, Privilege Log, and Further Initial Disclosures (Dkt. No. 27).

Before filing of this motion, Defendant's counsel conferred with Plaintiffs' counsel via email on December 19, 2014 and December 23, 2014, pursuant to LCvR 7(m). Plaintiffs consent to an extension to January 5, 2015.

Plaintiffs filed its Motion to Compel Discovery, Privilege Log, and Further Initial

Disclosures on December 15, 2014. Under the local rules, Public Resource's opposition would

be due on a day when its counsel's offices would be closed for the holidays. Counsel for

defendant thus asked Plaintiffs to consent to an extension of time to oppose the motion on

December 19, 2014. On December 23, 2014, Jonathan Hudis, counsel for Plaintiffs, agreed to an

extension of the opposition due date to January 5, 2015.

Fed. R. Civ. P. 6(b)(1) provides that the court may extend a filing deadline for good cause. Good cause exists here because: (i) all parties consent to the extension, (ii) the extension is a short one due to a holiday office closure, and (iii) the extension does not prejudice any party or affect any court hearing dates or case management deadlines.

ACCORDINGLY, Public Resource respectfully requests that the Court grant it an extension until January 5, 2015 to oppose Plaintiffs' Motion to Compel Discovery, Privilege Log, and Further Initial Disclosures.

Dated: December 24, 2014 Respectfully submitted,

/s/ Andrew P. Bridges

Andrew P. Bridges (admitted)
abridges@fenwick.com
FENWICK & WEST LLP
555 California Street, 12th Floor
San Francisco, CA 94104

Telephone: (415) 875-2300 Facsimile: (415) 281-1350

David Halperin (D.C. Bar No. 426078)

davidhalperindc@gmail.com

1530 P Street NW

Washington, DC 20005

Telephone: (202) 905-3434

Corynne McSherry (pro hac vice)

corynne@eff.org

Mitchell L. Stoltz (D.C. Bar No. 978149)

mitch@eff.org

ELECTRONIC FRONTIER FOUNDATION

815 Eddy Street

San Francisco, CA 94109

Telephone: (415) 436-9333 Facsimile: (415) 436-9993

Attorneys for Defendant/Counterclaimant

Public.Resource.Org, Inc.